

**ConBrio Fund Partners Ltd**

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# Engagement Policy

## Engagement Policy

The Financial Conduct Authority's Conduct of Business Sourcebook ("COBS") contains various obligations relating to shareholder engagement and transparency which apply to asset managers. These obligations were implemented in the UK on 10 June 2019. The obligations affect UK UCITS managers, such as ConBrio Fund Partners Limited ("ConBrio").

We are required to develop and publicly disclose an engagement policy which complies with the requirements set out in COBS and publicly disclose on an annual basis how that engagement policy has been implemented in a way that meets the requirements (including disclosure of certain of voting activities in respect of shares in investee companies) or to publish a clear and reasoned explanation of why we have chosen not to comply any such requirements. The engagement policy must describe how ConBrio:

- integrates shareholder engagement in its investment strategies;
- monitors investee companies on relevant matters (e.g. strategy, financial and non-financial performance and risk, capital structure, social and environmental impact and corporate governance);
- conducts dialogues with investee companies;
- exercises voting and any other shareholder rights;
- cooperates with other shareholders;
- communicates with relevant stakeholders of investee companies; and
- manages actual and potential conflicts of interests in relation to ConBrio's engagement.

As an independent authorised fund manager, ConBrio delegates investment management on behalf of the authorised funds we operate. We have systems and controls in place to oversee the investment managers we appoint, including procedures for reviewing their engagement and voting policies, and we will monitor their compliance with COBS, where relevant. We have, therefore, chosen not to have our own engagement policy.

25 January 2024